

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-C and defendant American Medical Systems, Inc. ("AMS") advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in these actions, parties to bear their own costs.

Respectfully:

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Dated: July 12, 2018

EXHIBIT A – DR. SHEZAD MALIK LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:16-CV-07488	Lou Jean Dyer v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT B – LIEFF CABRASER HEIMANN & BERNSTEIN

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:17-CV-01936	Lisa Lynn Grenning v. Ethicon, Inc., Johnson & Johnson, American Medical Systems Holdings, Inc.

EXHIBIT C – MORGAN & MORGAN

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:15-CV-08277	Donna Moore, Paul Moore v. Ethicon, Inc., Johnson & Johnson, American Medical Systems Holdings, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on July 12, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Stephen J. McConnell